

EXHIBIT 3

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

SEA SHEPHERD CONSERVATION SOCIETY,

Plaintiff,

v.

PAUL WATSON, THE CAPTAIN PAUL WATSON
FOUNDATION, SEA SHEPHERD ORIGINS,

Defendants.

Case No.: 2:22-cv-00227-WKS

**STIPULATION FOR ENTRY OF CONSENT JUDGMENT AND PERMANENT
INJUNCTION AS TO DEFENDANT WATSON AND DEFENDANT CPWF**

WHEREAS, Plaintiff Sea Shepherd Conservation Society (“SSCS”) and Defendant Paul Watson (“Watson”) and Defendant The Captain Paul Watson Foundation (“CPWF,” and, together with Watson, collectively, the “Watson Defendants”) have entered into a settlement agreement with an effective date of September 29, 2023 (the “Settlement Agreement”), settling the dispute giving rise to the above-captioned action between SSCS and the Watson Defendants, pursuant to which agreement SSCS and the Watson Defendants stipulate to the immediate entry of the Consent Judgment and Permanent Injunction attached hereto, without any admission of liability;

WHEREAS, SSCS and the Watson Defendants stipulate and agree that this Court shall retain jurisdiction over this matter for the purposes of enforcing the Settlement Agreement under the authority of *Kokkonen v. Guardian Life Insurance Company of America*, 511 U.S. 375, 381-82 (1994); and

WHEREAS, this stipulation and the Consent Judgment and Permanent Injunction do not apply to the third Defendant in the instant matter, Sea Shepherd Origins (“Origins”), which is instead the subject of a Stipulation of Dismissal Without Prejudice filed simultaneously herewith.

NOW THEREFORE, SSCS and the Watson Defendants stipulate and agree to the immediate entry of the Consent Judgment and Permanent Injunction.

SO STIPULATED AND AGREED, this 3rd day of October, 2023.

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